



Gerber

GERBER PRODUCTS COMPANY
NEW JERSEY COMPANYGERBER PRODUCTS COMPANY • 700 KIMBALL DRIVE • BASKINGGAP, NEW JERSEY 07004
973.563.8000 • FAX: 973.563.8121 • www.gerber.com

August 15, 2005

Arthur Neal
 Director, Program Administration
 National Organic Program
 USDA-AMS/TMO-NOP
 1400 Independence Ave., SW. Room 4008
 So., Ag Stop 0268
 Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Gerber Products Company supports the continued allowance of the following substance(s):

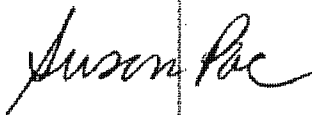
| Name of Substance | Location on National List (ie. 205.605(a)) | Reason for continued allowance. | Supporting Documents (example: research data or other international organic programs) |
|-------------------|--|--|---|
| Citric Acid | 205.605(a) | Controls the pH of the product | NOSB review in minutes April, 1995 |
| Ascorbic Acid | 205.605(b) | Source of vitamin C – see comments below | NOSB review in minutes April, 1995 See references 1 and 2 |

Additional comments about Ascorbic Acid (Vitamin C)

All commercially prepared pureed fruits for babies contain ascorbic acid to provide vitamin C. Vitamin C is an important nutrient for health and aids in the absorption of iron when eaten in conjunction with iron-rich foods. The recently published Start Healthy Feeding Guidelines for Infants and Toddlers cite baby food fruits as an important source of vitamin C, especially critical in the diets of breastfed infants (1). A dietary intake survey of over 3,000 infants and toddlers found that 67% of infants 7-8 months and 45% of infants 9-11 months were consuming commercially prepared baby food fruits (2). If ascorbic acid is removed from the National List, the choices for vitamin C-rich baby food fruits would be limited for organic consumers.

Thank you for your consideration of these comments. Gerber Products Company appreciates the opportunity to participate in this rulemaking.

Sincerely,



Susan Pac, MS, RD
Manager of Regulatory Affairs
Gerber Products Company

References

1. Butte N, Cobb K, Dwyer J, Graney L, Heird W, Rickard K. The Start Healthy Feeding Guidelines for Infants and Toddlers. *Journal of the American Dietetic Association*. 2004; 442-454.
2. Fox MK, Pac S, Devaney B, Jankowski L. Feeding Infants and Toddlers Study: What Foods Are Infants and Toddlers Eating? *Journal of the American Dietetic Association*. 2004; S22-S30.